EXHIBIT J

	A	B	J	K
1	INVALIDITY ANALYSIS OF JOHNSON ET AL. U.S. PATENTS 6,023,683, 6,055,516, AND 6,505,172			
2				
3	Citations to references are exemplary only and not intended to be exhaustive.			
4	A cell with tan shading indicated content obtained from another cell			
5	A cell with light green shading indicates a claim element that is anticipated by the reference in its column (possibly also asserted to be obvious)			
6	A cell with light yellow shading indicates a claim element that is not asserted to be anticipated by the reference in its column but is obvious			
7	A cell with light blue shading indicates a claim as a whole that is invalid for reasons other than §102 or §103.			
8	A cell with gray shading indicates matter appearing in Lawson interrogatory responses but not adopted by Dr. Shamos.			
9	A cell with rose shading indicates an element or step that is not found in the reference			
10				
11	ASSERTED CLAIMS	DEPENDENCY		

	A	B	J	K
	ASSERTED CLAIMS	**DEPEN DENCY**		
11				
12			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
13				
14	'172 Patent			
	1. An electronic sourcing system comprising:	1P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.

Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).

Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731 |
| 15 | | | | |
| 16 | | | P.O. Writer system renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, J-CON, or the IBM TV/2 system. | Claim 1 is anticipated by P.O. Writer. |
| 17 | a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately | 1a | P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).

As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) | To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.

P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575.

P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552.

The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.

Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575 |

	ASSERTED CLAIMS	DEPENDENCY	J	K
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	means for entering product information that at least partially describes at least one desired item	1b	The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	The function is disclosed in the reference. See, e.g., L0126944, which has the user entering "CAR" as a partial description of an item. Fields of product information are entered via a catalog screen (user interface): "The FILE DISPLAY screen appears. The ITEM MASTER FILE can be displayed in ITEM NUMBER sequence, DESCRIPTION sequence, or in COMMODITY CODE sequence. Move the cursor to the Item Description sort and display all items whose description begins with the letter C. as shown below." L0126557. The first letter of the description at least partially describes at least one desired item, as does the item number or commodity code. The display of information is performed by a software module that provides product information describing one or more items.
21	means for searching for matching items that match the entered product information in the selected portions of the database	1c	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	The reference discloses a search program, described, e.g., at L0126941-51. The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., at L0126946. A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723
23				P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.
24	means for generating an order list that includes at least one matching item selected by said means for searching	1d	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).	In response to a search, P.O. Writer returns a list from which items can be selected.
25			Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	Search results are selected by assigning them non-zero quantities and a list of desired catalog items is generated. L0126948. See also Fig.19-7, "Selecting/tems From The Catalogue."

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11				Shamos Opinion re P.O. WRITER
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	means for building a requisition that uses data obtained from said database relating to selected matching items on said order list	1e	P.O. Writer enabled items from the catalog screen to be selected for requisition by pressing F7. (L0126948).	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.
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	means for processing said requisition to generate purchase orders for said selected matching items.	1f	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition. The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.
31				
33	'516 Patent			
	1. An electronic sourcing system comprising:	1P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731
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35			P.O. Writer anticipates claim 1.	Claim 1 is anticipated by P.O. Writer.
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			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
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37	a collection of catalogs of items stored in an electronic format;	1a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
39	a first set of pre-determined criteria associated with said collection of catalogs;	1b	P.O. Writer associated a collection of catalogs with CATALOGUE IDs. (L0I27525). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0I27525.
41	a second set of pre-determined criteria associated with items from each of said catalogs;	1c	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525 & L0127528.

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42	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor catalog; and	1d	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.
43				Searching for "corresponding items" is disclosed because P.O. Writer enabled the user to order a given item from any of several different vendors. L0126552.
45	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	1e	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525).	A search engine (program) is described at L0126941-51 in relation to creating a purchase order by searching a catalog. For example, on page L0126944 the user enters "CAR" as a search criterion. The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.

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11	**ASSERTED CLAIMS**	**DEPEN DENCY**		
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47	2. An electronic sourcing system as recited in claim 1, wherein catalogs comprising said collection of catalogs are stored in separate databases.		P.O. Writer renders claim 2 obvious when combined with the Fisher RIMS system or King.	Each catalogue in P.O. Writer had a separate catalog ID and can be considered a separate database. "In this example the catalogue is composed of all items for Best Buy Supply. Another method for organizing catalogue may be by item classification or commodity. For example CATALOGUE ID could be set up called STATIONERY. This catalogue would contain all stationery items regardless of what vendor they are purchased from." L0126946 Claim 2 is anticipated by P.O. Writer.
48	6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.		P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525). P.O. Writer anticipates claim 6.	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525. Claim 6 is anticipated by P.O. Writer under all proposed constructions.
49	9. An electronic sourcing system comprising:	9P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731
50			P.O. Writer renders claim 9 obvious when combined with the Fisher system, King, or the SABRE system.	Claim 9 is anticipated by P.O. Writer.

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	ASSERTED CLAIMS	**DEPENDENCY**	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
11				
12				
13				
	a collection of catalogs of items stored in an electronic format;	9a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
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	a first identification code associated with a first item in a first catalog;	9b	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	P.O. Writer enabled a user to search for matching items among product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) Therefore, a first identification code is associated with a first item in a first catalog.
53				
	a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.	9c	Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)	This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless.
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11				
12			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
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	21. An electronic sourcing system comprising:	21P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731
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			P.O. Writer renders claim 21 obvious when combined with the Fisher RIMS system. Additionally, P.O. Writer renders claim 21 obvious when combined with the J-CON system and the Fisher RIMS system or the IBM TV 12 system.	
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	a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	21a	Items can be searched for by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	P.O. Writer's requisition module is the subject of an entire manual, L0127505-601. To the extent the claim requires a "requisition module" to generate criteria for searching, such a function is performed by the P.O. Writer search module using partial criteria as described in connection with '172 1c. To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element.
62				
	a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format,	21b	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]:" L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
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	ASSERTED CLAIMS	DEPENDENCY		
11				
12			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
13				
66	a catalog selection criteria used to select less than said entire collection,	21c	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522.
69	said searching module being used to generate additional search-module criteria for said data fields of said requisition module;	21d	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	To the extent meaning can be ascribed to this limitation, the search screen at L0127527 generates additional search-module criteria for data fields, e.g. "BEGINS WITH."
70	a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;	21e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	"The P.O. WRITER PLUS Requisitioning Interface allows the Purchasing Department to convert requisitions into Purchase Orders quickly and efficiently." L0126966. Requisitions can be split into separate purchase orders: "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966
71	wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	21f		This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless.

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	ASSERTED CLAIMS	**DEPENDENCY**	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
11				
12				
13	wherein said multiple sources is limited by said catalog searching module providing a match according to said user-generated criteria, said search-module criteria and a determination system that located items are generally equivalent; and	21g		To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g., Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system."
74				
76	wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.	21h		To the extent ePlus contends that Lawson's present system meets this limitation, i.e., that linking equivalent items comprises a "determination system." the reference and Lawson's prior art system also disclose the limitation. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g., Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.

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	22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.		P.O. Writer renders claim 22 obvious when combined with the Fisher RIMS system. Additionally, the P.O. Writer system renders claim 22 obvious when combined with J-CON and the Fisher RIMS system or the IBM TV/2 system.	This element appears to have no meaning. To the extent it has meaning sufficient to accuse Lawson's present system, it is also disclosed in the reference and in Lawson's prior art system. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g., Best Buy and Bayless. All the items have the identical indentification code A1000. To the extent Plaintiff alleges this claim to be infringed by Lawson's current system, claim 22 is anticipated by P.O. Writer.
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	29. An electronic sourcing system comprising:	29	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731
79				
			P.O. Writer renders claim 29 obvious when combined with the Fisher RIMS system, SABRE or J-CON.	
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81	a collection of catalogs of items stored in an electronic format;	29a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
83	a first set of pre-determined criteria associated with said collection of catalogs;	29b	P.O. Writer associated a collection of catalogs with CATALOGUE IDs. (L0I27525). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0I27525.
85	a second set of pre-determined criteria associated with items from each of said catalogs;	29c	The P.O. Writer system associated items with criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525 & L0127528.

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	A — ASSERTED CLAIMS	B — DEPENDENCY	J	K
11				
12			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
13 / 86	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;	29d	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522.

P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552.

The database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. |
| 89 | a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol. | 29e | P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).

The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) | A search engine (program) is described at L0126941-51 in relation to creating a purchase order by searching a catalog. For example, on page L0126944 the user enters "CAR" as a search criterion.

The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528. |
| 91 | a cross reference table linking a vendor item catalog number from said vendor with an item catalog number from said predetermined third party. | 29f | | To the extent ePlus contends that Lawson's present system meets this limitation, i.e., that linking equivalent items comprises a "determination system." the reference and Lawson's prior art system also disclose the limitation.

This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent. |
| 94 | '683 Patent | | | |

ASSERTED CLAIMS	DEPENDENCY	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
3. An electronic sourcing system comprising:	3P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731
		P.O. Writer anticipates claim 3.	P.O. Writer anticipates claim 3.
at least two product catalogs containing data relating to items associated with the respective sources;	3a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
means for selecting the product catalogs to search;	3b	P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46).	The reference discloses a search program, described, e.g., at L0126941-51. The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., at L0126946. A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723

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	A	B	J	K
	ASSERTED CLAIMS	**DEPENDENCY**		
11				
12			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
13				
	means for searching for matching items among the selected product catalogs;	3c	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	The reference discloses a search program, described, e.g., at L0126941-51. The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., at L0126946. A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723
102				
	means for building a requisition using data relating to selected matching items and their associated source(s);	3d	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0I26948)	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.
105				
	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	3e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition. The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.
107				
	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	3f	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g., Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent. Cross-referenced items and identical items are shown in the table at L0126552
109				

	A	B	J	K
	ASSERTED CLAIMS	DEPENDENCY		Shamos Opinion re P.O. WRITER
11				
12			P.O. WRITER (per interrogatory responses and supplemental)	
13				
	6. An electronic sourcing system comprising:	6P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731
116			The P.O. Writer system anticipates claim 6.	
117	a database containing data relating to items associated with at least two sources;	6a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
118	means for searching for matching items in the database;	6b	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	The reference discloses a search program, described, e.g., at L0126941-51. The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., at L0126946. A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723
120				

	ASSERTED CLAIMS	DEPENDENCY	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
11				
12				
13				
	means for building a requisition using data relating to selected matching items and their associated source(s);	6c	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0I26948)	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.
122				
	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	6d	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition. The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.
123				
	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	6e	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent. Cross-referenced items and identical items are shown in the table at L0126552
125				
	26. A method comprising the steps of:	26P	The P.O. Writer system anticipates claim 26.	The reference discloses a method. Claim 26 is anticipated by P.O. Writer, as shown below.
132				

	A	B	J	K
	ASSERTED CLAIMS	DEPENDENCY	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
11				
12				
13				
133	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	26a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575
135	selecting the product catalogs to search;	26b	P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46).	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. See also '516 1d.
137	searching for matching items among the selected product catalogs;	26c	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	The reference discloses a search program, described, e.g., at L0126941-51. The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., at L0126946. A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723
138				P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.

	A	B	J	K
	ASSERTED CLAIMS	**DEPENDENCY**		
11				
12			P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
13				
	building a requisition using data relating to selected matching items and their associated source(s);	26d	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36. See also '172 1e, '683 3d.
140				
	processing the requisition to generate one or more purchase orders for the selected matching items; and	26e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition. The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.
142				
	determining whether a selected matching item is available in inventory.	26f	P.O. Writer included an inventory Control Module that enabled tracking of on-hand inventory balances. (L0126633).	"The Inventory Control Module allows you to track on-hand Inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633. The Inventory Control module is the subject of an entire manual at L0126148-395.
144				
	28. A method comprising the steps of:	28P	The P.O. Writer system anticipates claim 28.	The reference discloses a method. Claim 28 is anticipated by P.O. Writer, as shown below.
146				

	A	B	J	K
	ASSERTED CLAIMS	DEPEN DENCY	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
11				
12				
13				
	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	28a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).

As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) | To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.

P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded In the sample data base." L0126575.

P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552.

The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.

Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575 |
| 147 | | | | |
| | selecting the product catalogs to search; | 28b | P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). | P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522.

P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552.

See also '516 1d. |
| 149 | | | | |
| | searching for matching items among the selected product catalogs; | 28c | P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).

The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) | The reference discloses a search program, described, e.g., at L0126941-51.

The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., at L0126946.

A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723 |
| 151 | | | | |

	ASSERTED CLAIMS	DEPENDENCY	P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
	A	**B**	**J**	**K**
11				
12				
13	building a requisition using data relating to selected matching items and their associated source(s);	28d	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0I26948)	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36. See also '172 1e, '683 3d.
154	processing the requisition to generate one or more purchase orders for the selected matching items; and	28e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition. The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.
156	converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	28f	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.
158				Cross-referenced items and identical items are shown in the table at L0126552
159				"converting" and "substituting" have been construed to be synonyms. Therefore, see also '683 3f ("means for converting")

	A	B		J	K
	ASSERTED CLAIMS	**DEPEN DENCY**			
11					
12				P.O. WRITER (per interrogatory responses and supplemental)	Shamos Opinion re P.O. WRITER
13					
165	29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.			P.O. Writer included an inventory Control Module that enabled tracking of on-hand inventory balances. (L0126633).	"The Inventory Control Module allows you to track on-hand inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633. The Inventory Control module is the subject of an entire manual at L0126148-395.